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September 28, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room TWB204
445 12th Street, SW
Washington, DC 20554

RE: Ex Parte
Second Application by BellSouth Telecommunications, Inc. and BellSouth Long Distance,
Inc. for Provisioning of In-Region, interLATA Service in Louisiana., CC Docket No. 98-121

Dear Ms. Roman Salas:

On Friday September 24, 1999, Robert Mulvey, Jack Meek, and I of AT&T met with Andrea Kearney, Jon Reel, Claudia Pabo, Jessica Rosenworcel, Alex Belinfante, Diana Lee, Eric Einhorn, Florence Setzer, Julie Patterson, Johanna Mikes and John Stanley of the Common Carrier Bureau. The purpose of this meeting was to walk through the Hot Cut provisioning process between AT&T and Bell Atlantic- New York (as depicted on the attached chart). In addition, AT&T discussed the loop provisioning performance data summarized in the other attachments, all of which were distributed at the meeting.

Two copies of this Notice are being submitted to the Secretary of the FCC at the request of Staff.

Sincerely,

Robert W. Quinn, Jr.

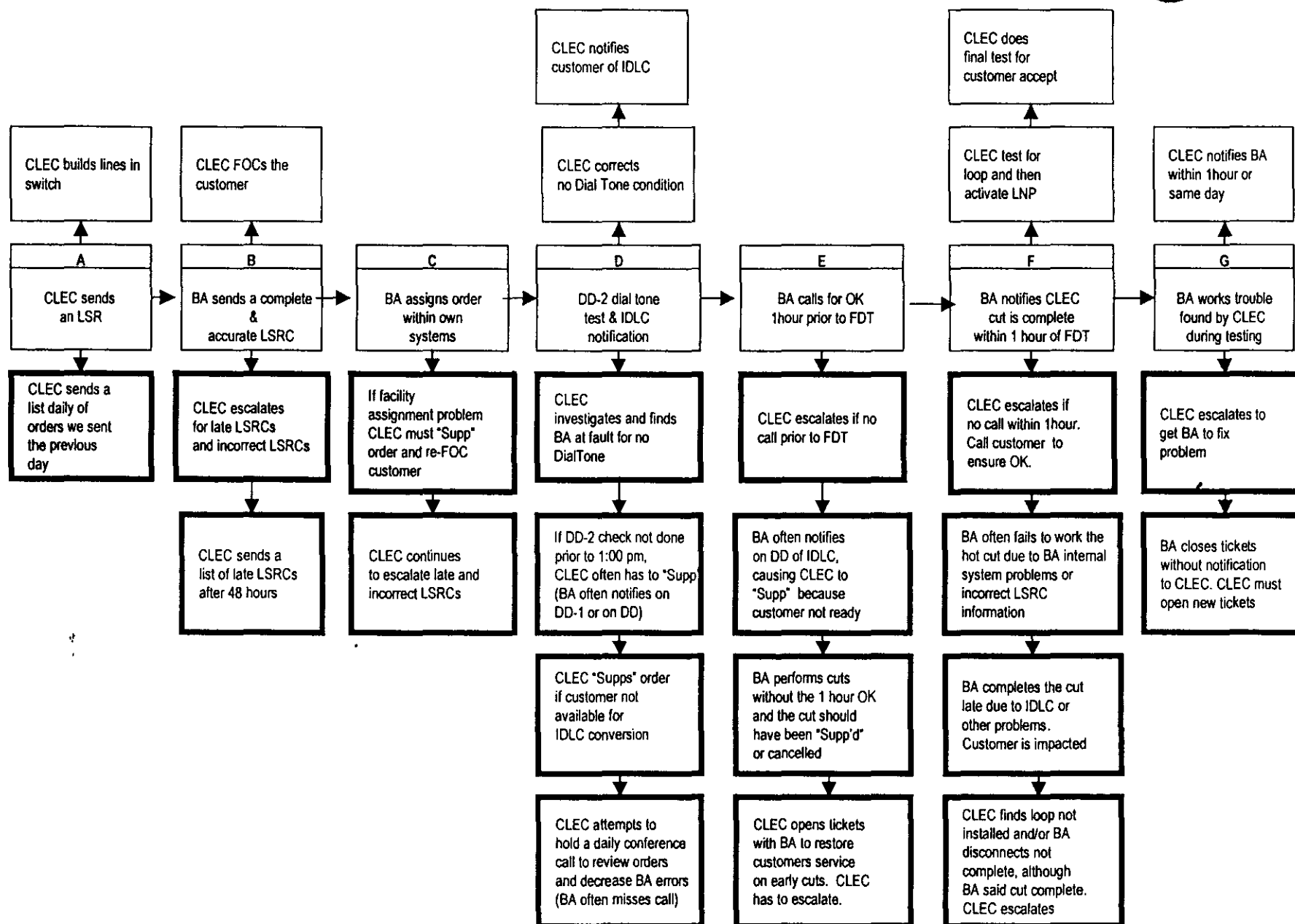
cc: A. Kearney J. Reel
A. Belinfante C. Pabo
J. Rosenworcel D. Lee
E. Einhorn F. Setzer
J. Stanley J. Mikes
J. Patterson

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BA Hot Cut Process Flows and CLEC 'Penalty Boxes'



TIME PERIODS															
	3/23- 4/19	4/20- 5/3	5/4- 5/10	5/11- 5/17	6/21- 6/25	6/28- 7/2	7/5- 7/9	7/12- 7/16	7/19- 7/23	7/26- 7/30	8/2- 8/6	8/9- 8/13	8/16- 8/20	8/23- 8/27	8/30- 9/3
No. of Orders Provisioned	56	81	37	32	54	71	175	138	145	180					
% Orders w/Loops Not Working	16%	22%	35%	31%	15%	17%	8%	13%	13%	12%					
No. Orders w/Loops Not Working	9	18	13	10	8	12	14	18	19	21					
Time Out Of Serv. < 1 Hr.	1	0	0	0	0	0	0	0	0	0					
1-4 Hrs.	2	6	1	3	1	1	2	4	3	3					
4-24 Hrs.	5	7	4	4	4	1	2	3	8	4					
>24 Hrs.	1	4	8	3	3	10	10	11	8	14					
% Orders Supp on or Just Prior to Due Date	N/A	N/A	N/A	N/A	27%	15%	19%	20%	14%	20%					
No. Orders Supp. On Or Just Prior To Due Date	N/A	N/A	N/A	N/A	15	11	34	28	20	37					
Total % Negative Customer Experience	N/A	N/A	N/A	N/A	26%	12%	20%	24%	20%	24%					
% LSRC Inaccurate	25% (28/113)	26% (33/127)	34% (13/38)	14% (27/199)	59% (166/282)	51% (162/316)	63% (97/154)	63% (91/144)	64% (108/170)	64% (93/145)					
% Failure to Follow Process Even When Loop Works									50%	60%					

Source: Various Affidavits of Jack Meek, Case No. 97-C-0271
e:\docs\acg\timeperiods

SUMMARY OF LIMITED BA-NY HOT CUT LOOP
PERFORMANCE DATA CONTAINED IN
AT&T'S 4/28/99 271 JOINT REPLY AFFIDAVIT

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **March 23 through April 19** -- the first four weeks of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **56** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **9** of the orders -- approximately **16%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's acknowledged provisioning errors.
- Customers experienced interruptions of telephone service ranging from about **one-half hour** to more than **48 hours** as a result of BA-NY's provisioning errors.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23. For example, BA-NY has provided initial notification on a hot cut due date that the customer is served by IDLC facilities. This demonstrates conclusively that BA-NY failed to perform required testing **two days before the due date** as it has committed to do under the revised process.
- **One quarter** (**28** out of 113) of the LSRCs BA-NY provided to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

UPDATE SUMMARY OF BA-NY HOT CUT LOOP
PERFORMANCE FOR THE
PERIOD APRIL 20 THROUGH MAY 3

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **April 20 through May 3** -- the fifth and sixth full weeks of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **81** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **18** of the orders -- approximately **22%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's acknowledged provisioning errors.
- Customers experienced interruptions of telephone service ranging from more than **1 hour** to **7 days** as a result of BA-NY's provisioning errors.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23. For example, BA-NY has provided initial notification on a hot cut due date that the customer is served by IDLC facilities. This demonstrates conclusively that BA-NY failed to perform required testing **two days before the due date** as it has committed to do under the revised process.
- **One quarter** (**33** out of 127) of the LSRCs BA-NY provided to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

UPDATE SUMMARY OF BA-NY HOT CUT LOOP
PERFORMANCE FOR THE
PERIOD MAY 4 THROUGH MAY 10

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **May 4 through May 10** -- the seventh full week of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **37** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **13** of the orders -- approximately **35%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's acknowledged provisioning errors.
- Customers experienced interruptions of telephone service ranging from **2 hours** to **7 days** as a result of BA-NY's provisioning errors.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23. For example, BA-NY has provided initial notification on a hot cut due date that the customer is served by IDLC facilities. This demonstrates conclusively that BA-NY failed to perform required testing **two days before the due date** as it has committed to do under the revised process.
- **One third** (13 out of 38) of the LSRCs BA-NY provided to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

UPDATE SUMMARY OF BA-NY HOT CUT LOOP
PERFORMANCE FOR THE
PERIOD MAY 11 THROUGH MAY 17

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **May 11 through May 17** -- the eighth full week of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **32** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **10** of the orders -- approximately **31%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's acknowledged provisioning errors.
- Customers experienced interruptions of telephone service ranging from **at least 1 hour** to **more than four days** as a result of BA-NY's provisioning errors.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23. For example, BA-NY has provided initial notification on a hot cut due date that no dial tone existed. This shows that BA-NY failed to perform required testing **two days before the due date** as it has committed to do under the revised process.
- **14%** (**27** out of 199) of the LSRCs BA-NY provided to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

UPDATE SUMMARY OF BA-NY HOT CUT LOOP
PERFORMANCE FOR THE
CALENDAR WEEK JUNE 21 THROUGH JUNE 25

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **June 21 through June 25** -- the fourteenth week of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **54** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **8** of the orders -- approximately **15%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's provisioning errors.
- Customers experienced interruptions of telephone service ranging from approximately **one and one half hours** to approximately **four days** as a result of BA-NY's provisioning errors.
- BA-NY's process failures also resulted directly in **15** hot cut loop orders due to cutover to AT&T this week -- approximately **27%** of the total number of hot cut loop orders that BA-NY attempted to cutover to AT&T -- being supplemented on (or just before) the hot cut loop due date for a later due date.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23, more than four months ago. For example, BA-NY has provided initial notification on the hot cut due date for multiple hot cut loop orders that: the customer is served by IDLC facilities; the carrier facility assignment is busy; or no dial tone existed. This shows that BA-NY routinely failed to perform required testing **two days before the due date** as it has committed to do under the revised process. Moreover, despite the fact that BA-NY and AT&T also agreed four months ago to the explicit requirements for a valid LSRC, BA-NY has continued to routinely provide AT&T with incorrect LSRCs.
- In total, BA-NY's provisioning errors resulted in a negative customer experience -- and harm to the competitive process -- for approximately **26%** of the hot cut loop orders scheduled for cutover during this period.
- Approximately **59%** (**166** out of **282**) of the LSRCs issued by BA-NY to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

UPDATE SUMMARY OF BA-NY HOT CUT LOOP
PERFORMANCE FOR THE
CALENDAR WEEK JUNE 28 THROUGH JULY 2

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **June 28 through July 2** -- the fifteenth week of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **71** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **12** of the orders -- approximately **17%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's provisioning errors.
- Customers experienced interruptions of telephone service ranging from approximately **2-3 hours** to approximately **20 days** as a result of BA-NY's provisioning errors.
- BA-NY's process failures also resulted directly in **11** hot cut loop orders due to cutover to AT&T this week -- approximately **15%** of the total number of hot cut loop orders that BA-NY attempted to cutover to AT&T -- being supplemented on (or just before) the hot cut loop due date for a later due date.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23, more than four months ago. For example, BA-NY has provided initial notification on the hot cut due date for multiple hot cut loop orders that the customer is served by IDLC facilities or no dial tone existed. This shows that BA-NY routinely failed to perform required testing **two days before the due date** as it has committed to do under the revised process. Moreover, despite the fact that BA-NY and AT&T also agreed four months ago to the explicit requirements for a valid LSRC, BA-NY continued to routinely provide AT&T with incorrect LSRCs.
- In total, BA-NY's provisioning errors resulted in a negative customer experience -- and harm to the competitive process -- for approximately **12%** of the hot cut loop orders scheduled for cutover during this period.
- Approximately **51% (162 out of 316)** of the LSRCs issued by BA-NY to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

UPDATE SUMMARY OF BA-NY HOT CUT LOOP
PERFORMANCE FOR THE
CALENDAR WEEK JULY 5 THROUGH JULY 9

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **July 5 through July 9** -- the sixteenth week of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **175** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **14** of the orders -- approximately **8%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's provisioning errors.
- Customers experienced interruptions of telephone service ranging from at least **1-2 hours** to approximately **7 days** as a result of BA-NY's provisioning errors.
- BA-NY's process failures also resulted directly in **34** hot cut loop orders due to cutover to AT&T this week -- approximately **19%** of the total number of hot cut loop orders that BA-NY attempted to cutover to AT&T -- being supplemented on (or just before) the hot cut loop due date for a later due date.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23, more than four months ago. For example, BA-NY has provided initial notification on the hot cut due date for multiple hot cut loop orders that the customer is served by IDLC facilities or no dial tone existed. This shows that BA-NY routinely failed to perform required testing **two days before the due date** as it has committed to do under the revised process. Moreover, despite the fact that BA-NY and AT&T also agreed four months ago to the explicit requirements for a valid LSRC, BA-NY has continued to routinely provide AT&T with incorrect LSRCs.
- In total, BA-NY's provisioning errors resulted in a negative customer experience -- and harm to the competitive process -- for approximately **20%** of the hot cut loop orders scheduled for cutover during this period.
- Approximately **63%** (**97** out of **154**) of the LSRCs issued by BA-NY to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

UPDATE SUMMARY OF BA-NY HOT CUT LOOP
PERFORMANCE FOR THE
CALENDAR WEEK JULY 12 THROUGH JULY 16

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **July 12 through July 16** -- the seventeenth week of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **138** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **18** of the orders -- approximately **13%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's provisioning errors.
- Customers experienced interruptions of telephone service ranging from approximately **2 hours** to more than **7 days** as a result of BA-NY's provisioning errors.
- BA-NY's process failures also resulted directly in **28** hot cut loop orders due to cutover to AT&T this week -- approximately **20%** of the total number of hot cut loop orders that BA-NY attempted to cutover to AT&T -- being supplemented on (or just before) the hot cut loop due date for a later due date.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23, more than four months ago. For example, BA-NY has provided initial notification on the hot cut due date for multiple hot cut loop orders that the customer is served by IDLC facilities or no dial tone existed. This shows that BA-NY routinely failed to perform required testing **two days before the due date** as it has committed to do under the revised process. Moreover, despite the fact that BA-NY and AT&T also agreed four months ago to the explicit requirements for a valid LSRC, BA-NY has continued to routinely provide AT&T with incorrect LSRCs.
- In total, BA-NY's provisioning errors resulted in a negative customer experience -- and harm to the competitive process -- for approximately **24%** of the hot cut loop orders scheduled for cutover during this period.
- Approximately **63%** (**91** out of **144**) of the LSRCs issued by BA-NY to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

UPDATE SUMMARY OF BA-NY HOT CUT LOOP
PERFORMANCE FOR THE
CALENDAR WEEK JULY 19 THROUGH JULY 23

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **July 19 through July 23** -- the eighteenth week of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **145** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **19** of the orders -- approximately **13%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's provisioning errors.
- Customers experienced interruptions of telephone service ranging from approximately **2 hours** to approximately **7 days** as a result of BA-NY's provisioning errors.
- Even when BA-NY provided loops that worked, BA-NY failed to follow the explicitly defined process for at least **72** orders -- approximately **50%** of the hot cut loop orders that BA-NY attempted to cutover to AT&T.
- BA-NY's process failures also resulted directly in **20** hot cut loop orders due to cutover to AT&T this week -- approximately **14%** of the total number of hot cut loop orders that BA-NY attempted to cutover to AT&T -- being supplemented on (or just before) the hot cut loop due date for a later due date.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23, approximately five months ago. For example, BA-NY has provided initial notification on the hot cut due date for multiple hot cut loop orders that the customer is served by IDLC facilities or no dial tone existed. This shows that BA-NY routinely failed to perform required testing **two days before the due date** as it has committed to do under the revised process. Moreover, despite the fact that BA-NY and AT&T also agreed five months ago to the explicit requirements for a valid LSRC, BA-NY has continued to routinely provide AT&T with staggering numbers of incorrect LSRCs.
- In total, BA-NY's provisioning errors resulted in a negative customer experience -- and harm to the competitive process -- for approximately **20%** of the hot cut loop orders scheduled for cutover during this period.
- Approximately **62%** (**108** out of 170) of the LSRCs issued by BA-NY to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

UPDATE SUMMARY OF BA-NY HOT CUT LOOP
PERFORMANCE FOR THE
CALENDAR WEEK JULY 26 THROUGH JULY 30

Despite very small volumes of AT&T hot cut loop orders, BA-NY's actual performance for **July 26 through July 30** -- the nineteenth week of the revised hot cut loop provisioning process -- is patently inadequate to enable and sustain competitive market entry.

- For the **180** AT&T hot cut loop orders that BA-NY actually attempted to cutover to AT&T, **21** of the orders -- approximately **12%** -- resulted in hot cut loops that didn't work as initially provisioned by BA-NY due to BA-NY's provisioning errors.
- Customers experienced interruptions of telephone service ranging from approximately **1½ hours** to **more than 5 days** as a result of BA-NY's provisioning errors.
- Even when BA-NY provided loops that worked, BA-NY failed to follow the explicitly defined process for at least **107** orders -- approximately **60%** of the hot cut loop orders that BA-NY attempted to cutover to AT&T.
- BA-NY's process failures also resulted directly in **37** hot cut loop orders due to cutover to AT&T this week -- approximately **20%** of the total number of hot cut loop orders that BA-NY attempted to cutover to AT&T -- being supplemented on (or just before) the hot cut loop due date for a later due date.
- BA-NY is plainly not following the revised procedures that it explicitly committed to AT&T would be followed as of March 23, approximately five months ago. For example, BA-NY has provided initial notification on the hot cut due date for multiple hot cut loop orders that the customer is served by IDLC facilities or no dial tone existed. This shows that BA-NY routinely failed to perform required testing **two days before the due date** as it has committed to do under the revised process. Moreover, despite the fact that BA-NY and AT&T also agreed five months ago to the explicit requirements for a valid LSRC, BA-NY has continued to routinely provide AT&T with staggering numbers of incorrect LSRCs.
- In total, BA-NY's provisioning errors resulted in a negative customer experience -- and harm to the competitive process -- for approximately **24%** of the hot cut loop orders scheduled for cutover during this period.
- Approximately **64%** (**93** out of **145**) of the LSRCs issued by BA-NY to AT&T were incorrect. The errors included: incorrect telephone number; no telephone number; incorrect due date; incorrect cable and pair information; missing TXNU number; and incorrect TXNU number.

Re: Metrics for Hot Cut on time provisioning. Taken from Jack Meeks' Supplemental Affidavit filed August 27, 1999.

1. PR-4-06

As we understand and interpret the C2C PR-4-06 metric, and as we report in Jack Meek's 9/10/99 affidavit, a hot cut loop order missed appointment occurs only under three clearly defined circumstances:

- A. An early cut (i.e., before the frame due time);
- B. A cut not completed and notification to the CLEC provided within the 1 hour window starting at the frame due time.
- C. An order resulting in a hot cut loop that does not work when BA-NY cuts it over to a CLEC and the CLEC reports the trouble to BA-NY before the close of business on the cutover day. If the loop does not work as provisioned, and the CLEC does not report the trouble to BA-NY until the next business day it is reported as an "I" code and is included in PR-6-02, % installation troubles reported with 7 days.

2. PR-4-06, Possible areas of dispute.

- A. BA-NY has apparently argued that it is not obligated to complete the hot cut and provide notification within 1 hour of the frame due time. We disagree. BA-NY's argument would effectively expand the C2C 1 hour window to a 2 hour window.
- B. BA-NY apparently argues that a CLEC must report a hot cut trouble within 1 hour of notification to the CLEC of completion of the cut, not by close of the business day. This has the effect of increasing the number of I codes and decreasing the number of missed appointments. This is consistent with the revised provisioning procedures agreed to in March, but is not consistent with the language in the C2C metrics.
- C. BA-NY has apparently recently argued that the on time provisioning window for IDLC loops is morning or afternoon, not the 1 hour window from the frame due time. The C2C metrics do not have this exception to

the 1 hour provisioning standard. BA-NY first proposed the a.m. or p.m. window for IDLC in late April. Consequently, BA-NY's a.m./p.m. proposal is not part of the revised procedures agreed to in March.

We do not know, because BA-NY does not report it, which of these interpretations BA-NY is or is not using in its C2C metric reports.

3. PR-4-06, AT&T proposed changes.

As the notes above indicate, there are inconsistencies between the provisioning rules agreed to in March and the C2C metrics, which were established in February before the revised provisioning procedures were defined and agreed upon. In some cases, BA-NY apparently supports the C2C metric (e.g., failure to meet the due date minus 2 process agreed to in March is not reflected in BA-NY's metric reports) and in others, it apparently supports the March process over the strict language of C2C (e.g., the 1 hour trouble ticket reporting metric for provisioning problems agreed to in March but not reflected in C2C).

AT&T believes that the provisioning rules and the metrics must be made consistent, and the metrics must adjust to the provisioning rules where they are inconsistent. Accordingly, AT&T has proposed that the missed appointment metric be modified as follows.

A. We support the 1 hour reporting window for distinguishing loops that don't work at provisioning from I codes. This is inconsistent with C2C as written, but is acceptable to AT&T.

B. An order that is supped (by either party) due to an incomplete or inaccurate LSRC is a missed appointment.

C. An order that is supped (by either party) due to BA-NY's failure to perform dial tone testing before noon on DD-2 and to timely advise a CLEC of a problem is a missed appointment.

D. An order where BA-NY fails to call the CLEC for concurrence for a cutover 1 hour before the scheduled cutover time is a missed appointment. +.

Applying these principles to BA-NY's hot cut performance for AT&T in July produces an on time provisioning level of 46%. Applying only categories 1 A, B and C, above, produces an on time performance level of 76%.

If you have any questions, please feel free to call me or Bob Mulvee.